

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**In re: Wanda Elois Daniel**

**Case No. 12-33766-KLP  
Chapter 13**

Debtor's Address: 105 East Leigh Street  
Richmond, VA 23219

Last Four Digits of Debtor's SSN: XXX-XX-3558

**JOINT MOTION TO CONTINUE HEARING**

COME NOW, Wanda Elois Daniel (the "Debtor"), by counsel, and Neighborhood Housing Services of Richmond, Inc., ("NHSR"), by counsel, and state as follows:

1. On February 26, 2013, NHSR filed an Amended Objection to the Confirmation of Debtor's Chapter 13 plan (the "Amended Objection to Confirmation") in the instant case.
2. On May 23, 2013, Debtor filed an Objection to the Claim (the "Objection to Claim") filed by NHSR in the instant case.
3. The Court scheduled an Evidentiary Hearing on the Amended Objection to Confirmation, and the Objection to Claim, for September 25, 2013, at 2:00 p.m.
4. Counsel jointly and respectfully request a continuance of the Evidentiary Hearing until November 13, 2013, at 2:00 p.m.

Emily Connor Fort (VSB #83889)  
Mark C. Leffler (VSB #40712)  
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Telephone (804) 358-9900  
Counsel for Debtor

5. Counsel jointly represent that they have been and continue to be engaged in discovery, and have communicated with each other in an effort to narrow or resolve the issues. Counsel believe that additional time will allow the parties to conclude with discovery and continue in efforts to reach a settlement.

WHEREFORE, Wanda Elois Daniel and NHSR, jointly request the Court grant the instant Motion and continue the Evidentiary Hearing presently scheduled for September 25, 2013, at 2:00 p.m. until November 13, 2013, at 2:00 p.m.

**Wanda Elois Daniel**

By Counsel:

/s/ Emily Connor Fort  
Emily Connor Fort (VSB #83889)  
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Counsel for Debtor

**Neighborhood Housing Services of Richmond, Inc.**

By Counsel:

/s/ Emily Connor Fort on behalf of Alexander H. Ayers with permission via email  
Alexander H. Ayers (VSB# 77826)  
Counsel for Neighborhood Housing Services of Richmond, Inc.  
Ayers & Stolte, PC  
[aayers@ayerslaw.com](mailto:aayers@ayerslaw.com)  
Via ECF

**CERTIFICATE OF SERVICE**

I hereby certify that on September 16, 2013, a copy of the foregoing Motion was mailed, first class mail, postage prepaid, to Debtor, and served via the Court's ECF system to Alexander H. Ayers, Esquire, Carl M. Bates, Chapter 13 Trustee, and the Office of the U.S. Trustee.

/s/ Emily Connor Fort  
Counsel for Debtor